

LAW OFFICE OF ROBERT M. BONE

ROBERT M. BONE, SBN 181526

bob@robertbonelaw.com

645 Fourth Street, Suite 205

Santa Rosa, CA 95404

Telephone: (707) 525-8999

Facsimile: (707) 542-4752

DANIEL F. CROWLEY, ESQ. (SBN 130261)

DANIEL CROWLEY & ASSOCIATES

P. O. Box R

San Rafael, California 94913

Telephone: (415) 723-5800

Facsimile: (415) 785-3389

Attorney for Claimant

Ralph Hein

UNITED STATES BANKRUPTCY COURT

NORTHER DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

PG&E Corporation,

and

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*All paper shall be filed in the Lead Case, No.
19-30088-DM

Case No. 19-30088-DM

Chapter 11

Lead Case, Jointly Administered

**DECLARATION OF MOVANT RALPH
HEIN IN SUPPORT OF MOTION
PURSUANT TO FED. R. BANKR. PROC.
7015 AND 7017 TO ENLARGE TIME TO
FILE PROOF OF CLAIM PURSUANT TO
FED. R. BANKR. PROC. 9006(b)(1)**

Date: February 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic/Video Appearances Only

United States Bankruptcy Court

Courtroom 17,

450 Golden Gate Ave., 16th Floor

San Francisco, CA

Judge: Hon. Dennis Montali

Objection Deadline: February 2, 2021

I, Ralph Hein, hereby declare:

1 1. I am the movant in this matter and I suffered losses and damages on five properties
2 in Paradise, CA as a result of the Camp Fire in 2018.

3 2. My filing for PGE Proof of Claim for the Camp Fire of November 8,2018, was
4 delayed due to several circumstances.

5 3. Our home of 45 years as well as four other properties that we own were all destroyed
6 Nov 8, 2018 in the Camp Fire. I was lucky to evacuate out of Paradise. It took me ten (10) hours
7 to get to a safe place where my life was not being threatened by the fire.

8 4. My wife of 49 years, Linda Hein, was at Windsor Care Center Skilled Nursing,
9 Chico, CA recovering from Cancer Surgery at the time of the fire. I was homeless and looking for
10 any suitable housing in the area as Linda was due to be released from Windsor Care Center Skilled
11 Nursing with nowhere to go. Linda was disabled and was in a wheelchair.

12 5. I was able to purchase a home in Orland, CA that was suitable for Linda and myself.
13 Linda passed away March 18 ,2019 at our home in Orland assisted by Enloe Hospital Home
14 Hospice. She had been ill for 4-5 years.

15 6. It took considerable time and effort to settle Linda's estate. The mental and physical
16 stress to my life was overwhelming. My time and energy was taken filing insurance claims and the
17 other work associated with addressing the loss of my wife. The last item relating to Linda's passing
18 was settled in January 2020.

19 7. All my computer and paper files were destroyed in my home in Paradise in the
20 Camp Fire in November 2018. COVID-19 delayed everything. These are my reasons for delay in
21 filing the PG&E Camp Fire Claim on time. Thank you for considering my late Proof of Claim.

22 8. All statements in this declaration are based on my own personal knowledge and
23 observation and from my review of the court and business records in this case, or upon information
24 and belief as indicated. If called to testify on this matter, I can and would competently testify to the
25 matters set forth in this Declaration.

26 I declare under penalty of perjury pursuant to the laws of the United States of
27 America that the foregoing is true and correct.
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Executed this 12th day of January, 2021, in Santa Rosa, California.

Dated: January 12, 2021

By: /s/ Ralph Hein
RALPH HEIN
Claimant and Movant